

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CASE NUMBER: 20-M- 739


ZACHARY C. WOOD
(DOB: 03/10/1975)

I, Dean W. Chappell, the undersigned complainant, being duly sworn, states the following is true and correct to the best of my knowledge and belief. That on or about September 29, 2020, in the State and Eastern District of Wisconsin, Zachary C. Wood, did commit a violation of Title 18, United States Code, Section 2252(a)(2) "distribution of child pornography." Further, that on or about October 12, 2020, in the State and Eastern District of Wisconsin, Zachary C. Wood, did commit a violation of Title 18, United States Code, Section 2422(b) "use of a computer to attempt to entice a minor to engage in sexual activity."

I further state that I am a Special Agent with the Federal Bureau of Investigation, and this complaint is based on the following facts:

Please see the attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant
Dean W. Chappell

Sworn to before me and subscribed in my presence,

October 13, 2020
Date

at Green Bay, Wisconsin
City and State

The Honorable James R. Sickel
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer



I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since August, 2004. As such, I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest warrants. I am currently assigned to the FBI's Milwaukee Division, Green Bay Resident Agency, as such, I am authorized to investigate violent crimes to include the distribution of child sexual abuse material. I have received training from other law enforcement officers in the investigation and enforcement of federal child sexual abuse material and exploitation laws in which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images depicting minors engaged in sexually explicit conduct (hereafter referred to as "child pornography"). I have also received training and gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer evidence identification, computer evidence seizure and processing, and various other criminal laws and procedures.

DETAILS OF THE INVESTIGATION

According to Winnebago County Sheriff's Office (WCSO) report L-WI-10-12-2020-0003694-001, which I believe to be truthful and reliable, on September 11, 2020, an FBI Task Force Officer (TFO) in an online undercover capacity was a member of an identified online Kik messaging group dedicated to the trading of child sexual abuse material. Kik user "bear7593" was also a member of this same public group.

On September 11, 2020, at approximately 9:13am, "bear7593" distributed one video of child sexual abuse material to the group. The video depicts a nude adult female lying on a bed

masturbating while a prepubescent male approximately 3 to 4 years old sits between her legs. The prepubescent male is not wearing any bottoms and his penis and anus are exposed. The adult female pulls the prepubescent male close to her vagina and forces him to touch her exposed vagina. The adult female continues to masturbate in front of the prepubescent male. The prepubescent male then continues to touch the adult female's vagina with some type of object and his hand.

On September 29, 2020, TFO began a private conversation with "bear7593." "Bear7593" stated he was a 40-year-old male from Wisconsin named Zack and sent a photo of himself. "Bear7593" also emailed a Mega link containing approximately 150 videos of child sexual abuse material to the online TFO.

On September 29, 2020, at approximately 2:29 pm, the user sent three videos of child sexual abuse materials to the TFO. The first was a video depicting a nude infant male lying on a bed while an adult female performed oral sex on the infant male. The second video depicted a prepubescent female approximately 5 to 7 years old wearing lingerie with her vagina and anus exposed. An adult female using a strap on dildo proceeds to penetrate the prepubescent female's anus. The third video depicts a nude adult female and nude prepubescent female approximately 6 to 9 years old. The adult female and prepubescent female both perform oral sex on one another. The adult female inserts an object into the prepubescent female's vagina.

On September 18, 2020, an administrative subpoena was served to Kik for subscriber information associated to the username "bear7593." On September 22, 2020, Kik provided the following information:

- First Name: Z
- Last Name: Bear
- Email: bear7593@yahoo.com (unconfirmed)
- Username: bear7593
- Registration Timestamp: 30 July 2020 12:40:33UTC
- IP Logs:
 - o A number of connections between August 22, 2020 and August 31, 2020 occurred from IP address 75.100.206.173, which resolves to TDS Telecom.
 - o A number of connections occurred from mobile IP addresses resolving to U.S. Cellular.
 - o The majority of connections from August 24, 2020 to September 21, 2020 occurred from IP addresses resolving to Gigenet.

On October 8, 2020, an administrative subpoena was served to TDS Telecom for subscriber information associated to IP address 75.100.206.173 on August 22, 2020 at 17:11UTC and August 31, 2020 at 10:29UTC. On October 8, 2020, TDS advised the same customer had been assigned the IP address since April 30, 2020 at 06:10UTC. TDS provided the following customer information:

- Account Name: Zachary Wood
- Service Address: S7638 West Grandview Avenue, Merrimac, Wisconsin 53561
- Phone Number: 608-381-1242

An Accurant query for S7638 West Grandview Avenue confirmed Wood was the current resident at that address.

During subsequent private conversations with the TFO, “Bear7593” provided his Snapchat username as “badgerfan7593” and phone number of 608-381-1242, which matches the telephone number listed on the TDS account.

In private conversations between the TFO and Zachary C. Wood, the TFO led Wood to believe that he was the parent of a 14-year-old daughter living in Winnebago County in the State and Eastern District of Wisconsin. The TFO and Wood had numerous conversations

wherein Wood expressed interest in having sex with children and with the TFO's 14-year-old daughter specifically.

On October 12, 2020, Zachary C. Wood a/k/a "bear7593" requested to have sex with the TFO's fictitious 14-year-old daughter and stated he would be in Oshkosh, Wisconsin at 4:00 p.m. for that purpose. I am aware that if sexual intercourse had occurred between Zachary Wood and a 14-year-old child, that would constitute the crime of Second Degree Sexual Assault of a Child in violation of Wisconsin Statutes section 948.02(2). Zachary Wood traveled from his home in Merrimack, Wisconsin, to a meeting location in Winnebago County, Wisconsin. Wood was arrested by the TFO and fellow law enforcement upon his arrival. Following his arrest, Wood admitted that his Kik username was "bear7593," that he had distributed sexually explicit images of children via the internet and Kik messaging platform, and, finally, that he had travelled to Winnebago County for the purpose of having sexual intercourse with an individual whom he believed to be a 14-year-old child.

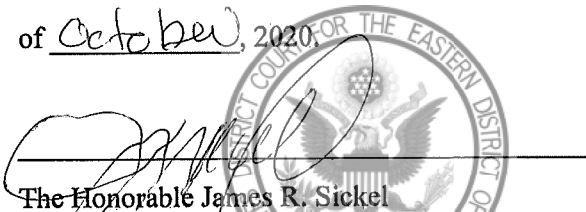
CONCLUSION

Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Zachary C. Wood, has committed acts in violation of Title 18, United States Code, Section 2422(b) "use of a computer to attempt to entice a minor to engage in sexual activity" and Title 18, United States Code, Section 2252(a)(2) "distribution of child pornography."



Special Agent Dean W. Chappell
Federal Bureau of Investigation

Subscribed and sworn before me this 13 day
of October, 2020.


The Honorable James R. Sickel
United States Magistrate Judge